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10 Attorneys for Defendant
11 National Consumer Telecom & Utilities Exchange, Inc.

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 JORGE OCHOA JR.,

15 Plaintiff,

16 v.
17 NATIONAL CONSUMER TELECOM &
18 UTILITIES EXCHANGE, INC, AT & T
19 MOBILITY, LLC, DISH NETWORK,
20 LLC, DIRECTV LLC, AND
21 BACKGROUNDCHECKS.COM, LLC.

22 Defendants.

23 Case No. 2:22-cv-01430-ART-DJA

24 **STIPULATION FOR EXTENSION
25 OF TIME FOR NATIONAL
CONSUMER TELECOM &
26 UTILITIES EXCHANGE, INC. TO
FILE RESPONSE TO COMPLAINT
(FIRST REQUEST)**

27 Defendant National Consumer Telecom & Utilities Exchange, Inc. (“Defendant” or
28 “NCTUE”), by and through its counsel of record, the law firm Greene Infuso, LLP, and Plaintiff
Jorge Ochoa Jr. (“Plaintiff” or “Ochoa”), by and through her counsel of record, the law firm of
Kind Law and Freedom Law Firm hereby stipulates and agrees as follows:

WHEREAS, Plaintiff filed its Complaint on September 2, 2022;

WHEREAS, Defendant NCTUE’S deadline to respond to Plaintiff’s Complaint is October
3, 2022;

WHEREAS, due to the recent retention of counsel, NCTUE’s counsel needs additional time
to investigate and prepare a response to the Complaint;

WHEREAS, Plaintiff has agreed to give Defendant NCTUE up through and including
November 2, 2022 in which to respond to Plaintiff’s Complaint;

1 WHEREAS, there are no other deadlines that are affected by this stipulation that are
2 presently known to the parties; and

3 WHEREAS, this stipulation is not entered into for any improper purpose or to delay;

4 THEREFORE, Plaintiff and NCTUE hereby stipulate and agree that NCTUE may have up
5 through November 2, 2022 in which to respond to Plaintiff's Complaint.

6 DATED 21 day of September, 2022

DATED 21 day of September, 2022

7 Respectfully Submitted by:

Approved by:

8 **GREENE INFUSO, LLP**

KIND LAW

10 /s/ Michael V. Infuso

/s/ Michael Kind

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8860 S. Maryland Pkwy, Suite 106
Las Vegas, Nevada 89123

14 DATED 21 day of September, 2022

15 **FREEDOM LAW FIRM**

16 /s/ Gerardo Avalos

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, esq.
Nevada Bar No. 15171
8985 S. Eastern Ave., Suite 350
Las Vegas, Nevada 89123

21 **ORDER**

22 **IT IS SO ORDERED.**

23 DATED this 21st day of September, 2022.



24
25 DANIEL J. ALBREGTS
26 UNITED STATES MAGISTRATE JUDGE
27
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